

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SOMERVILLE PUBLIC SCHOOLS,  
167 Holland Street  
Somerville, MA 02144

and

EASTHAMPTON PUBLIC SCHOOLS  
50 Payson Avenue  
Easthampton, MA 01027

and

AMERICAN FEDERATION OF  
TEACHERS,  
555 New Jersey Avenue N.W.  
Washington, D.C. 20001

and

AMERICAN FEDERATION OF  
TEACHERS MASSACHUSETTS,  
38 Chauncy Street  
Suite 402  
Boston, MA 02111

and

AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL  
EMPLOYEES, COUNCIL 93  
8 Beacon Street  
Boston, MA 02108

and

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS  
555 New Jersey Avenue NW, Suite 600  
Washington, D.C. 20001

and

Civil Action No. 1:25-cv-10677

**DECLARATION OF RACHEL F. HOMER  
IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
1800 Massachusetts Ave, NW  
Washington, D.C. 20036

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States,  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500

and

LINDA MCMAHON, in her official  
capacity as Secretary of Education,  
400 Maryland Avenue S.W.  
Washington, D.C. 20202

and

U.S. DEPARTMENT OF EDUCATION,  
400 Maryland Avenue S.W.  
Washington, D.C. 20202

*Defendants.*

I, Rachel F. Homer, hereby certify and state:

1. I am Director of Democracy 2025 & Senior Attorney at Democracy Forward Foundation.

2. My business address is P.O. Box 34553, Washington, D.C. 20043. My business telephone number is 202-448-9090. My business fax is 202-796-4426. My email address is rhomer@democracyforward.org.

3. I am a member in good standing of the Bars of Massachusetts, the District of Columbia, the U.S. District Court for the District of Columbia, the U.S. District Court for the Western District of Wisconsin, the U.S. District Court for the District of Maryland, the U.S. Court of Appeals for the First Circuit, the U.S. Court of Appeals for the Fourth Circuit, the U.S. Court of Appeals for the Fifth Circuit, the U.S. Court of Appeals for the Seventh Circuit, the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Tenth Circuit, the U.S. Court of Appeals for the District of Columbia Circuit, and the Supreme Court of the United States. I have no pending disciplinary proceedings against me in any jurisdiction.

4. I have not been denied admission, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice before any bar, or before this Court or any other court.

5. I have not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose under this rule) revoked for misconduct.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.  
March 24, 2025

Respectfully submitted,

/s/ Rachel F. Homer

Rachel F. Homer

(MA State Bar No. 693642)

Democracy Forward Foundation

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*Attorney for Plaintiffs*